

# ROBERT GUILD

Attorney at Law

314 Pall Mall • Columbia, South Carolina 29201 • 803-252-1419 • bguild@mindspring.com

BY ELECTRONIC FILING AND SERVICE

February 10, 2022

Ms. Jocelyn D. Boyd  
Chief Clerk & Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, SC 29210

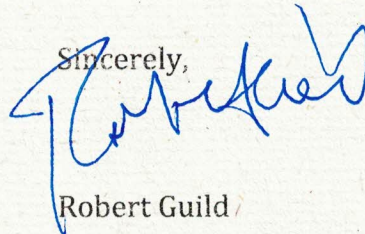
In re: Dominion Energy South Carolina, Incorporated Coal Retirement Docket Opened  
Pursuant to Commission Order No. 2021-418  
Docket No. 221-192-E

Dear Ms. Boyd:

Enclosed please find for filing and consideration in the above docket the Motion for Admission Pro Hac Vice for Justin T. Somolofske, Esquire, on behalf of Sierra Club, together with Docket Cover Sheet and Certificate of Service.

With kind regards I am

Sincerely,



Robert Guild

Encls.

CC: All Parties





## (Caption of Case)

In re: Dominion Energy South Carolina, Incorporated  
Coal Retirement Docket Opened Pursuant to  
Commission Order No. 2021-418

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

## COVER SHEET

DOCKET  
NUMBER: 2021 - 192 - E

(Please type or print)

Submitted by: Robert Guild

SC Bar Number: 2358

Address: 314 Pall Mall Street

Telephone: 803 917 5738

Columbia, SC 29201

Fax:

Other:

Email: bguild@mindspring.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

## DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition☒ Request for item to be placed on Commission's Agenda expeditiously☐ Other:

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input checked="" type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input checked="" type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other: _____	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other: _____	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

Print Form

Reset Form

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2021-192-E**

In re:

Dominion Energy South Carolina,  
Incorporated Coal Retirement Docket  
Opened Pursuant to Commission Order  
No. 2021-418

**MOTION FOR ADMISSION**  
***PRO HAC VICE***

Sierra Club hereby moves the Public Service Commission of South Carolina (“Commission”) to permit Justin T. Somelofske to practice *pro hac vice* before the Commission in the above-captioned matter.

Pursuant to SCACR 404, Mr. Somelofske, together with counsel of record, has filed a Verified Application for Admission *Pro Hac Vice* with the South Carolina Supreme Court. Attached hereto, is a stamped copy of the Verified Application as filed with the court.

WHEREFORE, as the provisions set forth in SCACR 404 have been satisfied, Sierra Club requests this motion be granted.

Dated: 2/10, 2022.

  
Robert Guild  
S.C. Bar No. 2358  
314 Pall Mall Street  
Columbia, SC 29201  
(803) 917-5738  
bguild@mindspring.com

*Attorney for Sierra Club*

# VERIFIED APPLICATION FOR ADMISSION *PRO HAC VICE* IN THE STATE OF SOUTH CAROLINA

IN RE:

Dominion Energy South Carolina, Inc. Coal  
Retirement Docket Opened Pursuant to  
Commission Order No. 2021-418

Docket No. 2021-192-E  
Public Service Commission of  
South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, SC 29210

Comes now Justin T. Somelofske, applicant herein, and respectfully represents the following:

1. Applicant resides at:

<u>16 Brant Road S</u>			
Street Address			
<u>Wakefield</u>	<u>Washington</u>	<u>RI</u>	<u>02879</u>
City	County	State	Zip Code
<u>862-219-1318</u>			
Telephone			

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of)

<u>Sierra Club</u>			
<u>50 F Street NW, Floor 8</u>			
Street Address			
<u>Washington</u>	<u>Washington</u>	<u>DC</u>	<u>20001</u>
City	County	State	Zip Code
<u>202-675-6275</u>	<u>862-219-1318</u>	<u>202-547-6009</u>	<u>justin.somelofske@sierraclub.org</u>
Primary Telephone	Cell Phone	Fax Number	Email Address

3. Applicant has been retained personally or as a member of the above-named law firm by

Sierra Club to provide legal representation in connection with the above case now pending before the above-named tribunal of the State of South Carolina.

4. Since January of 2021, applicant has been, and presently is, a

member in good standing of the bar of the highest court of the District of Columbia or the State of Rhode Island where applicant regularly practices law. Attached is a certificate of good standing dated within the last 90 days from the bar of the highest court of the District of Columbia or the State where applicant regularly practices law.

5. Applicant has been admitted to practice before the following courts: (List all of the following courts applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.)

Court:	Date Admitted:
State of Rhode Island	January 7, 2021
U.S. District Court of Rhode Island	August 31, 2021



Applicant is presently a member in good standing of the bars of those courts listed above, except as listed below: (List any court named in the preceding paragraph that applicant is no longer admitted to practice before.)

N/A

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency, except as provided below (give particulars, e.g., jurisdiction, court date):

N/A

7. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked, except as provided below (give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation):

N/A

8. Applicant never has had any certificate or privilege to appear and practice before any court or administrative body suspended or revoked, except as provided below (give particulars, e.g., date, court, administrative body, date of suspension and reinstatement):

N/A

9. Local counsel of record associated with applicant in this case is Robert Guild  
of the \_\_\_\_\_ law firm, which has offices at:

314 Pall Mall Street

Street Address

Columbia

City

803-252-1419

Primary Telephone

803-917-5738

South Carolina Bar Number

Richland

County

803-917-5738

Cell Phone

SC

State

Fax Number

29201

Zip Code

bguild@mindspring.com

Email Address

10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted).

N/A

11. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

12. Applicant respectfully requests to be admitted to practice in the above-named tribunal for this case only.

DATED this 26th day of January, 2022

  
\_\_\_\_\_  
JUSTIN T. SOMELOFSKE, APPLICANT

**VERIFICATION**STATE OF RHODE ISLANDCOUNTY OF WASHINGTON

I, JUSTIN T. SOMELOFSKE, do hereby swear or affirm under penalty of perjury that I am the applicant in the above-styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true. I understand that I am under a continuing duty to promptly update the information provided in the application until the tribunal has ruled on the motion for admission pro hac vice. Further, if the motion is granted, I understand that I am under a continuing duty to promptly update the information provided in the application as long as I continue to appear pro hac vice in the action or proceeding. Any updated information shall be provided to both the tribunal that granted the motion and to the tribunal in which the action or proceeding may then be pending.

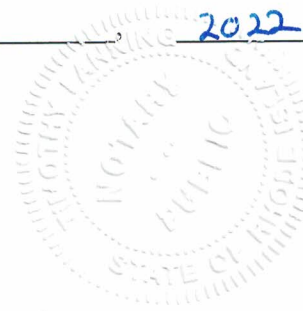
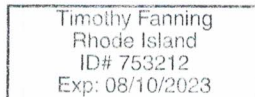
Justin T. Somełofske  
JUSTIN T, APPLICANT/AFFIANT

Subscribed and sworn to before me this 26 day of January, 2022

Timothy Fanning

Notary Public for the State of Rhode Island

My Commission Expires: 08/10/2023

**LOCAL COUNSEL CONSENT**

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 10th day of February, 2022

Robert Guild  
ROBERT GUILD, LOCAL COUNSEL OF RECORD

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by mail addressed to: South Carolina Supreme Court Office of Bar Admissions, PO Box 11330, Columbia, SC 29211, accompanied by payment of the \$250 filing fee payable to the South Carolina Supreme Court on this

10th day of February, 2022

Robert Guild  
ROBERT GUILD, LOCAL COUNSEL OF RECORD





Supreme Court of Rhode Island  
Providence

*This Certifies that*  
***Justin T. Somelofske***  
*of Providence, RI*

*is an Attorney and Counselor of the Supreme Court of the State of Rhode Island, and as such was on the 7th day of January, 2021 admitted to practice in all the courts of said state as appears of record in the Office of the Clerk of the Supreme Court and is in good standing and qualified to practice in said courts.*

*Given under our hands and the seal of said Supreme Court  
at Providence this the 18th day of January, 2022.*

*Debra A. Saunders*

Clerk



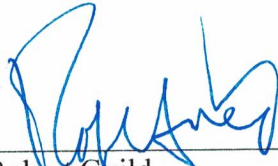
**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2021-192-E**

In re: Dominion Energy South Carolina,  
Incorporated Coal Retirement Docket  
Opened Pursuant to Commission Order No.  
2021-418

**CERTIFICATE OF SERVICE**

I hereby certify that I have served the persons listed on the official service list for Docket No. 2021-192-E, listed below, a copy of the foregoing document via electronic mail on this day, February 10 2022.

matthew.gissendanner@dominionenergy.com; chad.burgess@dominionenergy.com;  
clybarker@scconsumer.gov; rhall@scconsumer.gov; abateman@ors.sc.gov; richard@rlwhitt.law;  
DEX@smxblaw.com; alex@shissiaslawfirm.com; kmixson@selcsc.org; Eclancy@selcsc.org;  
bguild@mindspring.com; dori.jaffe@sierraclub.org; chuber@ors.sc.gov; selliott@elliottlaw.us;  
weston.adams@nelsonmullins.com; court.walsh@nelsonmullins.com

  
Robert Guild